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ATTORNEY FOR DEFENDANTS

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RITA JACKSON	:	NO.
	:	
v.	:	CIVIL ACTION
	:	
GREYHOUND LINES, INC. and	:	
RODERICK GIBSON	:	

NOTICE OF REMOVAL OF DEFENDANTS

Defendants, Greyhound Lines, Inc. and Roderick Gibson, through their undersigned attorney, give notice of the removal of the above captioned action to this Court of a State of Civil Action pending in the Court of Common Pleas of Philadelphia County, Pennsylvania, and in support thereof aver as follows:

1. A civil action has been brought against defendants by the plaintiff in the Court of Common Pleas of Philadelphia County at No. 140900579. A copy of Plaintiff's Amended Complaint is attached hereto as Exhibit "A".

2. The State Court where the action was originally filed is located in Philadelphia County, Pennsylvania, which is embraced within this judicial district.

3. The plaintiff is, at the time of the filing of this action, a citizen of the Commonwealth of Pennsylvania.

4. Defendant, Greyhound Lines, Inc. is a Delaware corporation with corporate headquarters located at 2221 E. Lamar Blvd., Suite 500, Arlington, Texas.

5. Defendant, Roderick Gibson is a citizen of the State of New Jersey.

6. Defendant 1001-1025 West Filbert St., LLC c/o Criterion Group LLC, was dismissed by the State Court by Order dated July 27, 2015. A copy of that Order is attached hereto as Exhibit "B".

7. Defendants previously filed a Notice of Removal of this action at No. 2:14-cv-05290-TJS prior to the dismissal of Defendant 1001-1025 West Filbert St., LLC c/o Criterion Group LLC. The Court remanded the action to State Court by Order dated October 24, 2014 for lack of subject matter jurisdiction. A copy of that Order is attached hereto as Exhibit "C".

8. With the dismissal of Defendant 1001-1025 West Filbert St., LLC c/o Criterion Group LLC, the requirements for diversity jurisdiction are satisfied under 28 U.S.C. § 1332.

9. This action is for an amount in controversy in excess of statutory jurisdictional limit for arbitration, together with costs of this action and damages for delay.

10. The statutory requirements having been met, the state action is properly removed to United States District Court for the Eastern District of Pennsylvania.

Respectfully Submitted:

KANE, PUGH, KNOELL, TROY & KRAMER, LLP

By: s/ Paul C. Troy Signature Code: PCT 1962
PAUL C. TROY, ESQUIRE
Attorney for Defendants